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U.S. DISTRICT COURT
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL EARL YELLOW,

Defendant.

INDICTMENT

VIOLATIONS:

COUNT 1: 18 U.S.C. § 922(g)(1),
Felon in Possession of a Firearm;
COUNTS 2-11: 16 U.S.C. § 688(a),
Unauthorized Taking of an Eagle.

Case: 2:18-cr-00470

Assigned To : Waddoups, Clark

Assign. Date : 10/18/2018

Description:

The Grand Jury Charges:

COUNT 1

18 U.S.C. § 922(g)(1)
(Felon in Possession of a Firearm)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the
Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, having been convicted of a crime punishable by imprisonment for more
than one year, did knowingly possess in and affecting commerce, a firearm, to wit: a Mossberg
702 Plinkster 22 caliber long rifle; in violation of 18 U.S.C. § 922(g)(1).

COUNT 2

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the
Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did
take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and
alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden
Eagle Protection Act.

COUNT 3

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the
Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did
take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and
alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden
Eagle Protection Act.

COUNT 4

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the
Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

COUNT 5

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

COUNT 6

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and

alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

COUNT 7

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

COUNT 8

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

COUNT 9

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

COUNT 10

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

COUNT 11

16 U.S.C. § 668(a)
(Unauthorized Taking of an Eagle)

On a date unknown to the Grand Jury between August 1, 2014 and August 17, 2015, in the Central Division of the District of Utah,

MICHAEL EARL YELLOW,

the defendant herein, knowingly and with wanton disregard for the consequences of his act, did take and possess, at any time and in any manner, any bald eagle and golden eagle, dead and alive, and its parts without a permit; in violation of 16 U.S.C. § 668(a), the Bald and Golden Eagle Protection Act.

NOTICE OF INTENT TO SEEK FORFEITURE

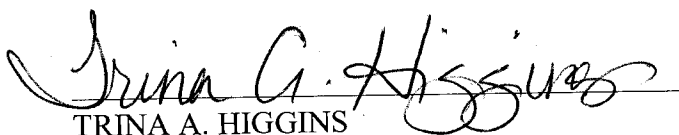
Pursuant to 16 U.S.C. § 668(b) and 28 U.S.C. § 2461, upon conviction of any offense in violation of 16 U.S.C. § 668(a), as set forth in this indictment, the defendant shall forfeit to the United States all bald or golden eagles, or parts thereof, taken possessed, sold, purchased, bartered, offered for sale, purchase, or barter, transported, exported, or imported contrary to the provisions of Title 16, Chapter 5A, Subchapter II, and all guns, traps, nets, and other equipment, vessels, vehicles, aircraft, and other means of transportation used to aid in the taking, possessing, selling, purchasing, bartering, offering for sale, purchase, or barter, transporting, exporting, or importing of any bird, or part thereof in violation of 16 U.S.C. § 668(a). The property to be forfeited includes, but is not limited to, the eagles and all eagle parts found at defendant's prior residence on the Uintah and Ouray Reservation.

A TRUE BILL:

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FOREPERSON OF GRAND JURY

JOHN W. HUBER
United States Attorney


TRINA A. HIGGINS
Assistant United States Attorney